

James R. Harrington, P.E.
Director, Remedial Bureau A
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau A, 12th Floor
625 Broadway
Albany, New York 12233-7015

Re: Coordination Protocols with the Navy

Dear Mr. Harrington:

Northrop Grumman is in receipt of the Navy's letter to the Department, dated July 8, 2015, and is writing to clarify a few points and inaccuracies contained in the Navy letter.

As an initial matter, Northrop Grumman reiterates its willingness to coordinate and cooperate with the Navy in developing a plan for investigation and remediation of the RE-108/GM-75 hot spot, as set forth in our letter of December 5, 2015. To that end, Northrop Grumman initially reached out to the Navy regarding development of such a plan. The Navy responded by stating that it was developing its plan and did not anticipate seeking Northrop Grumman's input. The Navy acknowledged this exchange in its July 8th letter.

On June 4, 2015, Lora Fly of the Navy contacted me and verbally requested that Northrop Grumman undertake additional work. During that call, I indicated that, while Northrop Grumman is willing to undertake certain additional work, such as the three items below, the Navy's verbal request, which included major proposals and new capital commitments and undertakings, would need to be presented and discussed more formally in writing by the Navy, so that Northrop Grumman could in turn discuss the proposal at more senior levels.

The Navy did not provide a written request to Northrop Grumman or give Northrop Grumman an opportunity to consider and discuss the details contained in its July 8th letter. We are preparing a separate letter to the Navy, in which we will inform them that there is a need to be communicating directly with each other and that it is counterproductive for them to communicate with us via letters to the Department.

It should come as no surprise to DEC that Northrop Grumman's commitment of cooperation with the Navy on the RE-108/GM-75 issues has never been meant to substitute Northrop Grumman for the Navy in implementing the Navy's well-established responsibilities. Northrop Grumman has been consistent throughout our discussions in pointing out that the GM-75/RE-108 area is primarily the Navy's responsibility. Indeed, the Navy took responsibility for this area both in its OU2 Record of Decision and in the Federal Facilities Site Remediation Agreement. There are, however, actions Northrop Grumman can do above and beyond what we have done thus far with respect to GM-75/RE-108 to facilitate the overall assessment and cleanup efforts without relieving either party of previously assumed responsibilities.

Northrop Grumman remains ready and willing to coordinate and cooperate with the Navy on this and similar issues. We will be communicating with the Navy in response to its July 8 letter on establishing

mutually agreeable protocols and channels of communications for addressing some of the larger RE-108/GM-75 assessment and remediation issues.

While we intend to discuss the GM-75/RE-108 matter further with the Navy, Northrop Grumman commits to the following:

1. Collect groundwater samples, analyze and provide data for wells around Bethpage Water District Plant 6 and at other discrete locations beginning in September 2015.
2. Work with the Department and the Navy in developing a groundwater model in support of a GM-75/RE-108 Hot Spot Treatment System.
3. Evaluate the capacity of Northrop Grumman's storm water basins to determine if additional water could be discharged to those basins.

Please do not hesitate to contact me, if you have any questions.

Sincerely,

Ed Hannon

Manager ESH&M